



United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

May 10, 2024

**By ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *Reclaim the Records, et ano., v. U.S. Dep't of State*, No. 23 Civ. 1471 (JMF)

Dear Judge Furman:

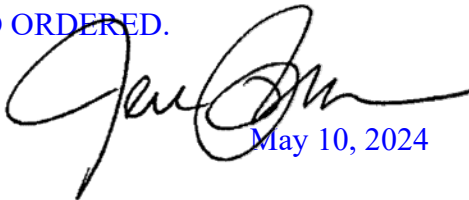
This Office represents the United States Department of State (the “Government”) in the above-referenced action brought pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 522. On behalf of the Government, I write respectfully to request a thirty-day extension of the May 13, 2024 deadline for the Government to file its reply papers in further support of its motion for summary judgment and in opposition to Plaintiffs’ cross-motion, to June 12, 2024, and a corresponding extension of the deadline for Plaintiffs’ reply, if any, from May 27, 2024, to June 26, 2024.

This is the first request by the Government for an extension for its reply/opposition papers, but the Court previously granted four extensions of Plaintiffs’ deadline to file its opposition/cross-motion papers. The extension is necessary because the Government needs more time to arrange for a declaration from an agency contractor to respond to the technical points raised by the declaration of Mr. Schnell, which accompanied Plaintiffs’ opposition/cross-motion. In addition, the Government intends to submit a supplemental declaration from Ms. Regina Ballard to address the parties’ declarations/arguments, but she will be away the end of this month. Plaintiffs consent to the requested extension.

I thank the Court for its consideration of this letter.

Application GRANTED. No further extensions will be granted. The Clerk of Court is directed to terminate ECF No. 43.

SO ORDERED.



May 10, 2024

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

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cc: Counsel of record (via ECF)